

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

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The Honorable Mark R. Warner United States Senate Washington, D.C. 20510

Dear Senator Warner:

Thank you for your May 18, 2016 letter to the U.S. Environmental Protection Agency (EPA) related to your constituent's concerns about the potential impacts to the community from excavating and transporting contaminated soil originating from the North Old Town Alexandria development. In order to better respond to the concerns raised in the letter, EPA requested a status update from the Virginia Department of Environmental Quality (VDEQ) on the environmental assessment and cleanup status of properties associated with the development and reviewed the draft site characterization work plan provided by VDEQ.

EPA has been involved with the evaluation of two sites in the Old North Town Alexandria area, namely the Alexandria Town Gas site and the former R.H. Bogle Chemical, also known as the North Robinson Terminal site. These sites were evaluated by EPA to determine if they warranted federal action. The first of these sites, Alexandria Town Gas site, is located adjacent to the North Robinson Terminal and is currently being addressed and remediated under the Virginia Voluntary Remediation Program (VRP). Although VDEQ is the lead agency for remediating the Alexandria Town Gas site, this site will remain in EPA's active site inventory until the cleanup is completed.

The North Robinson Terminal site was assessed by EPA in 1985 and EPA determined that the site did not warrant further federal action. It is currently undergoing redevelopment efforts under the direction of the state. The developers for the North Robinson Terminal site have recently entered into the VRP and will conduct environmental sampling of the soil and groundwater in order to meet the City of Alexandria's environmental program, the Virginia Petroleum Storage Tank Program, and the VRP requirements.

According to VDEQ, soil, groundwater, and sub-slab soil gas samples will be sampled for total petroleum hydrocarbons, metals, semi-volatile compounds, volatile organic compounds, pesticides, herbicides and polychlorinated hydrocarbons. A human health and ecological risk assessment will then be performed using the data from the sampling to determine if there is a threat to human health and the environment. After characterizing the site, the developer will coordinate with VDEQ to determine the type of cleanup, engineering controls, and institutional controls warranted for the site prior to redeveloping the site as a mixed use, multi-story building. If you have any additional questions regarding this site, please contact the VDEQ project manager, Angela McGarvey, at 804-698-4084.

Regarding the concerns raised in the letter about transportation of potentially contaminated soil through local neighborhoods, any hazardous waste removed from the site is required under the Resource Conservation and Recovery Act (RCRA) to be tracked via manifest from the time the hazardous waste is generated until it is disposed of in a permitted landfill. There are existing and specific requirements that must be met to ensure that the waste is properly contained during transport to prevent the public from being exposed.

If you have any questions, please do not hesitate to contact me or have your staff contact Mr. Brian Hamilton, EPA's Virginia Liaison, at 215-814-5497.

Sincerely,

Shawn M. Garvin

Regional Administrator

cc: Angela McGarvey, VADEQ